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Attorneys for Plaintiff and the Proposed Class

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

Willsim Latham, LLC, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MetroList Services, Inc.; Sacramento
Association of Realtors, Inc.; Placer County
Association of Realtors, Inc.; El Dorado
County Association of Realtors; Lodi
Association of Realtors; Yolo County
Association of Realtors; Central Valley
Association of Realtors; Amador County
Association of Realtors; Nevada County
Association of Realtors, Inc.; Sutter-Yuba
Association of Realtors, Inc.; RE/MAX
Holdings, Inc.; Anywhere Real Estate Inc.;
Keller Williams Realty, Inc.; eXp World
Holdings, Inc.; Norcal Gold Inc.; Century 21
Select Real Estate, Inc.; William L. Lyon &
Associates, Inc.; Paul M. Zagaris, Inc.; Guide
Real Estate, Inc.; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO. 2:24-cv-00244-KJM-DB

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER SETTING BRIEFING
SCHEDULE FOR DEFENDANT EXP
WORLD HOLDINGS, INC.'S MOTION
TO DISMISS**

Judge: Kimberly J. Mueller
Courtroom: 3, 15th Floor

Action Filed: January 18, 2024

Plaintiff Willsim Latham, LLC (“Plaintiff”) and Defendant eXp World Holdings, Inc. (“eXp”), by and through their undersigned counsel of record, hereby stipulate as follows:

RECITALS

1. **WHEREAS**, Plaintiff initiated this case on January 18, 2024 (ECF No. 1);
2. **WHEREAS**, all Defendants have been served with the complaint (ECF Nos. 8-23, 27, 28, 33);
3. **WHEREAS**, on February 21, 2024, the Court issued an Order Setting Status (Pretrial Scheduling) Conference, setting a status conference for July 11, 2024 (ECF No. 38);
4. **WHEREAS**, on June 20, 2024, counsel for Plaintiff met and conferred with counsel for eXp pursuant to Federal Rule of Civil Procedure 26(f);
5. **WHEREAS**, on June 24, 2024, eXp filed a motion to dismiss and noticed the hearing date for October 4, 2024 (ECF No. 78); and
6. **WHEREAS**, counsel for Plaintiff and counsel for eXp met and conferred and reached agreement on a briefing schedule and hearing date for eXp’s motion to dismiss:

STIPULATION

Accordingly, counsel for Plaintiff and eXp hereby stipulate as follows:

1. Plaintiff’s deadline to file an opposition to eXp’s motion to dismiss is August 6, 2024.
2. eXp’s deadline to file a reply in support of its motion to dismiss is August 30, 2024.
3. The hearing on eXp’s motion to dismiss will be held on October 4, 2024.

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PEARSON WARSHAW, LLP
555 MONTGOMERY STREET, SUITE 1205
SAN FRANCISCO, CALIFORNIA 94111

1 Dated: June 27, 2024

Respectfully submitted,

2 **PEARSON WARSHAW, LLP**

3 By: /s/ Jill M. Manning

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Attorneys for Plaintiff and the Proposed Class

10 Dated: June 27, 2024

Respectfully submitted,

11 **SAUL EWING, LLP**

12 By: /s/ Jason W. McElroy

13 Jason W. McElroy (*Pro Hac Vice*)

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20 *Attorneys for Defendant eXp World Holdings, Inc.*

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22
23 **ATTESTATION OF ELECTRONIC SIGNATURE**

24 The undersigned ECF user whose identification and password are being used to file the
25 foregoing document hereby attests that all signatories herein, and on whose behalf the filing is
26 submitted, concur in the filing's content and have authorized the filing.

27 Date: June 27, 2024

/s/ Jill M. Manning

Jill M. Manning

ORDER

Pursuant to the stipulation, **IT IS SO ORDERED** that:

1. Plaintiff's deadline to file an opposition to eXp's motion to dismiss is August 6, 2024.
2. eXp's deadline to file a reply in support of its motion to dismiss is August 30, 2024.
3. The hearing on eXp's motion to dismiss will be held on October 4, 2024.

DATE: July 5, 2024


CHIEF UNITED STATES DISTRICT JUDGE

PEARSON WARSHAW, LLP
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